

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

WILLIAM RICHARDSON, *
INDIVIDUALLY AND ON BEHALF OF *
SEANESEE RICHARDSON AS HIS LEGAL *
GUARDIAN AND PARENT, and * **CIVIL ACTION FILE NO:**
SEANESEE RICHARDSON, * **7:19-CV-00015-HL**

Plaintiff *

vs. *

FIAT CHRYSLER AUTOMOBILES (FCA) US, LLC, DAIMLERCHRYSLER AG, CHRYSLER, LLC, CHRYSLER GROUP, LLC, KIMBERLY RICHARDSON, and JOHN DOE, * **JURY DEMANDED**

Defendants *

PLAINTIFFS' MOTION TO EXCLUDE THE TESTIMONY OF NATHAN DORRIS

NOW INTO COURT, through undersigned counsel, come Plaintiffs, William Richardson and Seanesee Richardson, and files this Motion to Exclude the Testimony of Dr. Nathan Dorris pursuant to Fed. R. Evid. 702 and Daubert. Plaintiffs respectfully move for Court's entry of an Order excluding the testimony of Dr. Nathan Dorris, or in the alternative, to limit the scope of his testimony in accordance with Rule 702, and the authorities cited in the accompanying memorandum.

This 14th day of April, 2021.

Respectfully submitted,

PIASTA NEWBERN WALKER, LLC

/s/ Christopher B. Newbern

Christopher B. Newbern

Georgia Bar No. 314463

3301 Windy Ridge Pkwy
Suite 110
Atlanta, Georgia 30339
(404) 996-1296
chris@pnwlaw.com

DIDRIKSEN, SAUCIER & WOODS, PLC

/s/ Carl A. Woods, III

Caleb H. Didriksen, III

Louisiana Bar No. 1334

(Admitted Pro Hac Vice)

Carl A. “Trey” Woods, III

Louisiana Bar No. 33674

(Admitted Pro Hac Vice)

3114 Canal Street
New Orleans, LA 70119
(504) 586-1600
caleb@dswlawfirm.com
trey@dswlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the within and foregoing upon counsel of record via electronic mail to the following attorneys of record:

Michael R. Boorman, Esq.
Philip A. Henderson, Esq.
WATSON SPENCE, LLP
999 Peachtree St., Ste. 1130
Atlanta, GA 30309
mboorman@watsonspence.com
phenderson@watsonspence.com

J. Holder Smith, Jr.
P.O. Box 3007
Valdosta, GA 31604
(229) 242-2520
jaysmith@youngthagard.com

This 14th day of April, 2021.

/s/ Carl A. Woods, III.
Carl A. "Trey" Woods, III
Louisiana Bar No. 33674
(Admitted Pro Hac Vice)